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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRIANT CHUN-HOON and CARLO
GUGLIELMINO,

Plaintiffs,

v.

MCKEE FOODS CORPORATION, a
Tennessee corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. C05-00620 VRW

**STIPULATION AND PROPOSED-
ORDER TO AMEND CASE
MANAGEMENT DATES**

Hon. Vaughn R. Walker

TO THE COURT, ALL PARTIES, AND ALL ATTORNEYS OF RECORD:

IT IS HEREBY STIPULATED, by and between Plaintiffs Briant Chun-Hoon and Carlo Guglielmino and Defendant McKee Foods Corporation, through their respective counsel and subject to Court approval, to the following:

1. The parties have served their respective responses to interrogatories and requests for production of documents and have produced additional responsive documents. The depositions of the parties have been taken. Defendant has disclosed an expert witness who is expected to offer testimony in opposition to Plaintiffs' anticipated motion for class certification.

2. In order to accommodate their respective schedules, permit expert discovery on class certification issues, avoid duplicate and premature filings with the Court, and proceed in an orderly manner, the parties propose the following additions and revisions to the Court's pre-trial case management order of June 14, 2005:

January 27, 2006: Last day for Plaintiffs to file and serve motion for class certification.

February 6, 2006: Last day for Defendant to serve expert witness report on issues relating to Plaintiffs' class certification motion.

February 27, 2006: Last day to complete expert witness deposition regarding class certification issues.

March 9, 2006 Last day for Defendant to file and serve opposition to class certification motion.

March 23, 2006: Last day for Plaintiffs to file and serve reply in support of class certification motion.

April 13, 2006: Hearing on class certification motion at 2:00 p.m.

3. All other pretrial and case management dates shall remain unchanged unless otherwise ordered by the Court.

1 Dated: January 17, 2006

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4 /S/
MICHAEL HOFFMAN
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5 A Professional Corporation
6 Attorneys for Defendant

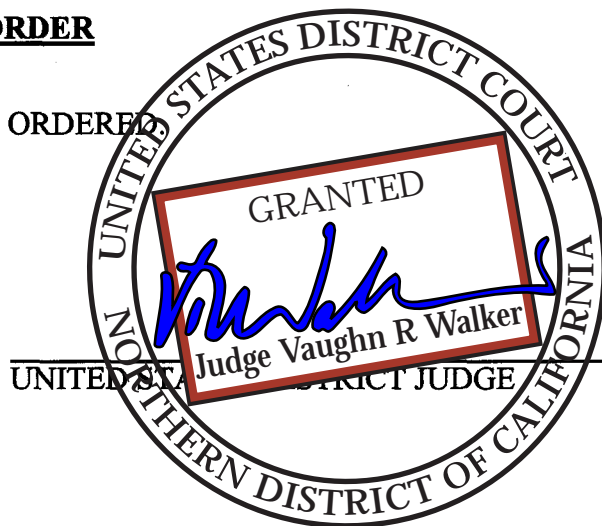
7 Dated: January 17, 2006

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10 /S/
11 KEVIN K. ENG
MARKUN ZUSMAN & COMPTON LLP
12 Attorneys for Plaintiffs

13 **ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED

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16 Dated: January 17, 2006



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